

EXHIBIT “6”

In the Matter Of:
BRYSON vs ROUGH COUNTRY

2:22-CV-017-RWS

JOSHUA BRYSON

April 12, 2023



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1 A I can't remember for sure.

2 Q Do you have a memory of being stopped or
3 sitting at the stoplight before the accident?

4 A Not that I can recall.

5 Q And what do you remember about what -- I
6 mean, I understand Cohen was buckled into his car
7 seat --

8 A (Witness nods head.)

9 Q -- but what do you remember about what he
10 was doing from the time you all left the house to
11 that point? I mean, whether he was playing with a
12 toy or had a paci or sleeping or -- do you have any
13 memory or information about that?

14 A He was sleeping.

15 Q Okay. And, I mean, this is kind of -- it
16 sounds like a stupid question, but how did you know
17 was he -- he was sleeping? Did you, like, look back
18 at him, or you -- something like that, or --

19 A I think whenever I had -- we had swapped
20 for me to be in the passenger seat and her driving,
21 we had checked and he was sleeping.

22 Q Okay. And that would have been when you
23 all swapped at the end of your mom's driveway?

24 A Yes, ma'am.

25 Q Okay. So I just -- I'm trying to make sure

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1 the one that had hit us --

2 Q Mm-hmm.

3 A -- but I feel like if, if the, the truck
4 wasn't so high up it would have been able to, like,
5 hit the bumper rather than just kind of crush the top
6 of the car. Cause you can see in the pictures that
7 it kind of went over the top of the car and I think
8 that probably caused a lot more damage than, than
9 what it could have.

10 Q And have you ever driven any vehicle in
11 your lifetime with a lift kit, or a lifted vehicle?

12 A No.

13 Q Do you have any family members that have
14 ever owned a vehicle with a lift kit on it?

15 A Not to my knowledge. No.

16 Q And I think I asked have you ever driven
17 one.

18 Have you ever ridden in a car or vehicle
19 with a lift kit on it; a lifted suspension?

20 A I'm sure I have. I can't tell you exactly.
21 I mean, I can't remember exactly, but I'm sure
22 probably at some point in my life I probably have.

23 Q What makes you think that you probably
24 have?

25 A I'm from the country. And that's a common

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1 thing in the country.

2 Q Would you say on most occasions while
3 you're out driving in the area where you leave --
4 live you'll see at least one vehicle that's lifted on
5 the roadway?

6 A Where I live currently, or where I lived
7 previously?

8 Q Well, when you grew up in the country, I
9 should say.

10 A When -- um. So ask that one more time.

11 Q So that was probably -- that was a bad
12 question.

13 Back when you -- when you talk about living
14 in the country, is that growing up?

15 A Yes, ma'am.

16 Q Okay. And now you would not consider
17 yourself to live in the country?

18 A Not as country --

19 Q Not as --

20 A -- as where I grew up.

21 Q -- country?

22 A Yeah.

23 Q Okay. Back growing up living in the
24 country, you know, as an estimate, any time you got
25 on the roadway as a passenger or driveway -- driver,